

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**WESTPORT INSURANCE  
CORPORATION,**

**Plaintiff**

**v.**

**RICHARD C. HEIDLAGE, et al.,**

**Defendants.**

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**CA No. 05-11780NMG**

**AGREED MOTION FOR EXTENSION OF TIME**

Westport Insurance Corporation (“Westport”), by its undersigned attorneys, moves for an extension of fourteen days, up to and including November 10, 2006, in which to file a response to the Cross-Motion for Summary Judgment of Richard C. Heidlage (“Heidlage”), and in support thereof, states as follows:

1. On June 5, 2006, Westport filed its Motion for Summary Judgment and supporting Memorandum of Law.
2. On October 13, 2006, following completion of discovery requested by Heidlage, Heidlage filed a response to Westport’s Motion for Summary Judgment and Cross-Motion for Summary Judgment.
3. Pursuant to Local Rule 7.1, Westport’s response to Heidlage’s Cross-Motion for Summary Judgment would be due October 30, 2006.
4. Subject to the Court’s approval, Richard M Bluestein, attorney for Heidlage, has agreed to allow Westport an extension of fourteen days, up to and including November 10, 2006, in which to file a response to Heidlage’s Cross-Motion for Summary Judgment.

5. The Court has set hearing of Westport's Motion and Heidlage's Cross-Motion for January 24, 2007.

6. Accordingly, Westport respectfully requests that the Court allow Westport an extension of fourteen days, up to and including November 13, 2006, in which to file a response to Heidlage's Cross-Motion for Summary Judgment.

Respectfully submitted,

Westport Insurance Corporation

By: /s/sbolotin  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 25, 2006.

By: /s/sbolotin